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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2010-212

12 **SHEILA SINGH DOBBINS,**  
a.k.a. **SHEILA JASVEER SINGH,**  
13 a.k.a. **SHEILA SINGH**  
2501 River Road  
14 Modesto, CA 95351

**A C C U S A T I O N**

15 **Registered Nurse License No. 570376**  
**Nurse Practitioner Certificate No. 13628**  
16 **Nurse Practitioner Furnishing No. 13628**

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
22 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),  
23 Department of Consumer Affairs.

24 Registered Nurse License No. 570376

25 2. On or about August 16, 2000, the Board issued Registered Nurse License Number  
26 570376 to Sheila Jasveer Singh, also known as Sheila Singh and Sheila Singh Dobbins  
27 ("Respondent"). Respondent's registered nurse license was in full force and effect at all times  
28 relevant to the charges brought herein and will expire on October 31, 2011, unless renewed.

1           **Nurse Practitioner Certificate No. 13628**

2           3.     On or about August 16, 2002, the Board issued Nurse Practitioner Certificate Number  
3     13628 to Respondent. Respondent's nurse practitioner certificate was in full force and effect at  
4     all times relevant to the charges brought herein and will expire on October 31, 2011, unless  
5     renewed.

6           **Nurse Practitioner Furnishing No. 13628**

7           4.     On or about April 2, 2003, the Board issued Nurse Practitioner Furnishing Number  
8     13628 to Respondent. Respondent's nurse practitioner furnishing number was in full force and  
9     effect at all times relevant to the charges brought herein and will expire on October 31, 2011,  
10    unless renewed.

11                   **STATUTORY AND REGULATORY PROVISIONS**

12           5.     Business and Professions Code ("Code") section 2750 provides, in pertinent part, that  
13     the Board may discipline any licensee for any reason provided in Article 3 (commencing with  
14     section 2750) of the Nursing Practice Act.

15           6.     Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
16     deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
17     to render a decision imposing discipline on the license. Under Code section 2811, subdivision  
18     (b), the Board may renew an expired license at any time within eight years after the expiration.

19           7.     Code section 2761 states, in pertinent part:

20                   The board may take disciplinary action against a certified or licensed  
21                   nurse or deny an application for a certificate or license for any of the following:

22                   (a) Unprofessional conduct, which includes, but is not limited to, the  
23                   following:

24                   (1) Incompetence, or gross negligence in carrying out usual certified or  
25                   licensed nursing functions.

26                   . . . .

27                   (d) Violating or attempting to violate, directly or indirectly, or assisting in  
28                   or abetting the violating of, or conspiring to violate any provision or term of this  
                    chapter or regulations adopted pursuant to it . . .

///

1 8. Code section 2762 states, in pertinent part:

2 In addition to other acts constituting unprofessional conduct within the  
3 meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a  
4 person licensed under this chapter to do any of the following:

5 (a) Obtain or possess in violation of law, or prescribe, or except as  
6 directed by a licensed physician and surgeon, dentist, or podiatrist administer to  
7 himself or herself, or furnish or administer to another, any controlled substance as  
8 defined in Division 10 (commencing with Section 11000) of the Health and Safety  
9 Code or any dangerous drug or dangerous device as defined in Section 4022 . . .

10 9. Code section 2725 states, in pertinent part:

11 . . . .

12 (b) The practice of nursing within the meaning of this chapter means  
13 those functions, including basic health care, that help people cope with difficulties in  
14 daily living that are associated with their actual or potential health or illness problems  
15 or the treatment thereof, and that require a substantial amount of scientific knowledge  
16 or technical skill, including all of the following:

17 (1) Direct and indirect patient care services that ensure the safety,  
18 comfort, personal hygiene, and protection of patients; and the performance of disease  
19 prevention and restorative measures.

20 (2) Direct and indirect patient care services, including, but not limited to,  
21 the administration of medications and therapeutic agents, necessary to implement a  
22 treatment, disease prevention, or rehabilitative regimen ordered by and within the  
23 scope of licensure of a physician, dentist, podiatrist, or clinical psychologist, as  
24 defined by Section 1316.5 of the Health and Safety Code.

25 . . . .

26 (4) Observation of signs and symptoms of illness, reactions to treatment,  
27 general behavior, or general physical condition, and (A) determination of whether the  
28 signs, symptoms, reactions, behavior, or general appearance exhibit abnormal  
characteristics, and (B) implementation, based on observed abnormalities, of  
appropriate reporting, or referral, or standardized procedures, or changes in treatment  
regimen in accordance with standardized procedures, or the initiation of emergency  
procedures.

(c) "Standardized procedures," as used in this section, means either of the  
following:

(1) Policies and protocols developed by a health facility licensed pursuant  
to Chapter 2 (commencing with Section 1250) of Division 2 of the Health and Safety  
Code through collaboration among administrators and health professionals including  
physicians and nurses.

(2) Policies and protocols developed through collaboration among  
administrators and health professionals, including physicians and nurses, by an  
organized health care system which is not a health facility licensed pursuant to  
Chapter 2 (commencing with Section 1250) of Division 2 of the Health and Safety  
Code.

1 The policies and protocols shall be subject to any guidelines for  
2 standardized procedures that the Division of Licensing of the Medical Board of  
3 California and the Board of Registered Nursing may jointly promulgate. If  
4 promulgated, the guidelines shall be administered by the Board of Registered Nursing  
5 . . .

6 10. Code section 2725.1 states:

7 Notwithstanding any other provision of law, a registered nurse may  
8 dispense drugs or devices upon an order by a licensed physician and surgeon if the  
9 nurse is functioning within a licensed clinic as defined in paragraphs (1) and (2) of  
10 subdivision (a) of Section 1204 of, or within a clinic as defined in subdivision (b) or  
11 (c) of Section 1206, of the Health and Safety Code.

12 No clinic shall employ a registered nurse to perform dispensing duties  
13 exclusively. No registered nurse shall dispense drugs in a pharmacy, keep a  
14 pharmacy, open shop, or drugstore for the retailing of drugs or poisons. No registered  
15 nurse shall compound drugs. Dispensing of drugs by a registered nurse, except a  
16 certified nurse-midwife who functions pursuant to a standardized procedure or  
17 protocol described in Section 2746.51 or a nurse practitioner who functions pursuant  
18 to a standardized procedure described in Section 2836.1, or protocol, shall not include  
19 substances included in the California Uniform Controlled Substances Act (Division  
20 10 (commencing with Section 11000) of the Health and Safety Code). Nothing in this  
21 section shall exempt a clinic from the provisions of Article 13 (commencing with  
22 Section 4180) of Chapter 9.

23 11. Code section 2726 states that "[e]xcept as otherwise provided herein, this chapter  
24 confers no authority to practice medicine or surgery".

25 12. Code section 2836.1 states, in pertinent part:

26 Neither this chapter nor any other provision of law shall be construed to  
27 prohibit a nurse practitioner from furnishing or ordering drugs or devices when all of  
28 the following apply:

(a) The drugs or devices are furnished or ordered by a nurse practitioner  
in accordance with standardized procedures or protocols developed by the nurse  
practitioner and the supervising physician and surgeon when the drugs or devices  
furnished or ordered are consistent with the practitioner's educational preparation or  
for which clinical competency has been established and maintained.

(b) The nurse practitioner is functioning pursuant to standardized  
procedure, as defined by Section 2725, or protocol. The standardized procedure or  
protocol shall be developed and approved by the supervising physician and surgeon,  
the nurse practitioner, and the facility administrator or the designee.

(c)(1) The standardized procedure or protocol covering the furnishing of  
drugs or devices shall specify which nurse practitioners may furnish or order drugs or  
devices, which drugs or devices may be furnished or ordered, under what  
circumstances, the extent of physician and surgeon supervision, the method of  
periodic review of the nurse practitioner's competence, including peer review, and  
review of the provisions of the standardized procedure.

....

(d) The furnishing or ordering of drugs or devices by a nurse practitioner occurs under physician and surgeon supervision. Physician and surgeon supervision shall not be construed to require the physical presence of the physician, but does include (1) collaboration on the development of the standardized procedure, (2) approval of the standardized procedure, and (3) availability by telephonic contact at the time of patient examination by the nurse practitioner.

....

(f)(1) Drugs or devices furnished or ordered by a nurse practitioner may include Schedule II through Schedule V controlled substances under the California Uniform Controlled Substances Act (Division 10 (commencing with Section 11000) of the Health and Safety Code) and shall be further limited to those drugs agreed upon by the nurse practitioner and physician and surgeon and specified in the standardized procedure.

(2) When Schedule II or III controlled substances, as defined in Sections 11055 and 11056, respectively, of the Health and Safety Code, are furnished or ordered by a nurse practitioner, the controlled substances shall be furnished or ordered in accordance with a patient-specific protocol approved by the treating or supervising physician. A copy of the section of the nurse practitioner's standardized procedure relating to controlled substances shall be provided, upon request, to any licensed pharmacist who dispenses drugs or devices, when there is uncertainty about the nurse practitioner furnishing the order.

....

(h) Use of the term "furnishing" in this section, in health facilities defined in Section 1250 of the Health and Safety Code, shall include (1) the ordering of a drug or device in accordance with the standardized procedure and (2) transmitting an order of a supervising physician and surgeon.

(i) "Drug order" or "order" for purposes of this section means an order for medication which is dispensed to or for an ultimate user, issued by a nurse practitioner as an individual practitioner, within the meaning of Section 1306.02 of Title 21 of the Code of Federal Regulations. Notwithstanding any other provision of law, (1) a drug order issued pursuant to this section shall be treated in the same manner as a prescription of the supervising physician; (2) all references to "prescription" in this code and the Health and Safety Code shall include drug orders issued by nurse practitioners; and (3) the signature of a nurse practitioner on a drug order issued in accordance with this section shall be deemed to be the signature of a prescriber for purposes of this code and the Health and Safety Code.

13. Code section 2051 states:

The physician's and surgeon's certificate authorizes the holder to use drugs or devices in or upon human beings and to sever or penetrate the tissues of human beings and to use any and all other methods in the treatment of diseases, injuries, deformities, and other physical and mental conditions.

14. Code section 2052 states:

(a) Notwithstanding Section 146, any person who practices or attempts to practice, or who advertises or holds himself or herself out as practicing, any system or mode of treating the sick or afflicted in this state, or who diagnoses, treats, operates

1 for, or prescribes for any ailment, blemish, deformity, disease, disfigurement,  
2 disorder, injury, or other physical or mental condition of any person, without having  
3 at the time of so doing a valid, unrevoked, or unsuspended certificate as provided in  
4 this chapter or without being authorized to perform the act pursuant to a certificate  
obtained in accordance with some other provision of law is guilty of a public offense,  
punishable by a fine not exceeding ten thousand dollars (\$10,000), by imprisonment  
in the state prison, by imprisonment in a county jail not exceeding one year, or by  
both the fine and either imprisonment.

5 (b) Any person who conspires with or aids or abets another to commit any  
6 act described in subdivision (a) is guilty of a public offense, subject to the punishment  
described in that subdivision.

7 (c) The remedy provided in this section shall not preclude any other  
8 remedy provided by law.

9 15. Code section 2242, subdivision (a), states that "[p]rescribing, dispensing, or  
10 furnishing dangerous drugs as defined in Section 4022 without an appropriate prior examination  
11 and a medical indication, constitutes unprofessional conduct."

12 16. Code section 4022 states:

13 "Dangerous drug" or "dangerous device" means any drug or device  
14 unsafe for self-use in humans or animals, and includes the following:

15 (a) Any drug that bears the legend: "Caution: federal law prohibits  
dispensing without prescription," "Rx only," or words of similar import.

16 (b) Any device that bears the statement: "Caution: federal law restricts  
17 this device to sale by or on the order of a -----," "Rx only," or words of similar  
18 import, the blank to be filled in with the designation of the practitioner licensed to use  
or order use of the device.

19 (c) Any other drug or device that by federal or state law can be lawfully  
dispensed only on prescription or furnished pursuant to Section 4006.

20 17. California Code of Regulations, title 16, section ("Regulation") 1442 states:

21 As used in Section 2761 of the code, 'gross negligence' includes an  
22 extreme departure from the standard of care which, under similar circumstances,  
would have ordinarily been exercised by a competent registered nurse. Such an  
23 extreme departure means the repeated failure to provide nursing care as required or  
failure to provide care or to exercise ordinary precaution in a single situation which  
24 the nurse knew, or should have known, could have jeopardized the client's health or  
life.

25 18. Regulation 1443 states:

26 As used in Section 2761 of the code, "incompetence" means the lack of  
27 possession of or the failure to exercise that degree of learning, skill, care and  
experience ordinarily possessed and exercised by a competent registered nurse as  
28 described in Section 1443.5.

1           19    Regulation 1443.5 states, in pertinent part:

2                   A registered nurse shall be considered to be competent when he/she  
3 consistently demonstrates the ability to transfer scientific knowledge from social,  
biological and physical sciences in applying the nursing process, as follows:

4                   (1) Formulates a nursing diagnosis through observation of the client's  
5 physical condition and behavior, and through interpretation of information obtained  
from the client and others, including the health team.

6                   (2) Formulates a care plan, in collaboration with the client, which ensures  
7 that direct and indirect nursing care services provide for the client's safety, comfort,  
hygiene, and protection, and for disease prevention and restorative measures.

8                   . . . .

9                   (4) Delegates tasks to subordinates based on the legal scopes of practice  
10 of the subordinates and on the preparation and capability needed in the tasks to be  
delegated, and effectively supervises nursing care being given by subordinates.

11                   (5) Evaluates the effectiveness of the care plan through observation of the  
12 client's physical condition and behavior, signs and symptoms of illness, and reactions  
to treatment and through communication with the client and health team members,  
13 and modifies the plan as needed.

14                   (6) Acts as the client's advocate, as circumstances require, by initiating  
15 action to improve health care or to change decisions or activities which are against the  
interests or wishes of the client, and by giving the client the opportunity to make  
informed decisions about health care before it is provided.

16           20.   Regulation 1470 states:

17                   The Board of Registered Nursing in conjunction with the Medical Board  
18 of California (see the regulations of the Medical Board of California, Article 9.5,  
Chapter 13, Title 16 of the California Code of Regulations) intends, by adopting the  
19 regulations contained in the article, to jointly promulgate guidelines for the  
development of standardized procedures to be used in organized health care systems  
20 which are subject to this rule. The purpose of these guidelines is:

21                   (a) To protect consumers by providing evidence that the nurse meets all  
requirements to practice safely.

22                   (b) To provide uniformity in development of standardized procedures.

23           21.   Regulation 1471 states:

24                   For purposes of this article:

25                   (a) "Standardized procedure functions" means those functions specified  
26 in Business and Professions Code Section 2725(c) and (d) which are to be performed  
according to "standardized procedures";

27           ///

28           ///

1 (b) "Organized health care system" means a health facility which is not  
2 licensed pursuant to Chapter 2 (commencing with Section 1250), Division 2 of the  
Health and Safety Code and includes, but is not limited to, clinics, home health  
agencies, physicians' offices and public or community health services;

3 (c) "Standardized procedures" means policies and protocols formulated  
4 by organized health care systems for the performance of standardized procedure  
functions.

5 22. Regulation 1472 states:

6 An organized health care system must develop standardized procedures  
7 before permitting registered nurses to perform standardized procedure functions. A  
8 registered nurse may perform standardized procedure functions only under the  
9 conditions specified in a health care system's standardized procedures; and must  
provide the system with satisfactory evidence that the nurse meets its experience,  
training, and/or education requirements to perform such functions.

10 23. Regulation 1474 states:

11 Following are the standardized procedure guidelines jointly promulgated  
12 by the Medical Board of California and by the Board of Registered Nursing:

13 (a) Standardized procedures shall include a written description of the  
method used in developing and approving them and any revision thereof.

14 (b) Each standardized procedure shall:

15 (1) Be in writing, dated and signed by the organized health care system  
16 personnel authorized to approve it.

17 (2) Specify which standardized procedure functions registered nurses may  
perform and under what circumstances.

18 (3) State any specific requirements which are to be followed by registered  
19 nurses in performing particular standardized procedure functions.

20 (4) Specify any experience, training, and/or education requirements for  
performance of standardized procedure functions.

21 (5) Establish a method for initial and continuing evaluation of the  
22 competence of those registered nurses authorized to perform standardized procedure  
functions.

23 (6) Provide for a method of maintaining a written record of those persons  
24 authorized to perform standardized procedure functions.

25 (7) Specify the scope of supervision required for performance of  
standardized procedure functions, for example, immediate supervision by a physician.

26 (8) Set forth any specialized circumstances under which the registered  
27 nurse is to immediately communicate with a patient's physician concerning the  
patient's condition.

28 ///



1 (9) State the limitations on settings, if any, in which standardized  
procedure functions may be performed.

2 (10) Specify patient record keeping requirements.

3 (11) Provide for a method of periodic review of the standardized  
4 procedures.

### 5 COST RECOVERY

6 24. Code section 125.3 provides, in pertinent part, that the Board may request the  
7 administrative law judge to direct a licensee found to have committed a violation or violations of  
8 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
9 enforcement of the case.

### 10 CONTROLLED SUBSTANCES AND DANGEROUS DRUGS AT ISSUE

11 25. "Vicodin" is a compound consisting of 5 mg hydrocodone bitartrate, also known as  
12 dihydrocodeinone, and 500 mg acetaminophen per tablet, and is a Schedule III controlled  
13 substance as designated by Health and Safety Code section 11056, subdivision (e)(4). Vicodin is  
14 also a dangerous drug within the meaning of Code section 4022 in that it requires a prescription  
15 under federal law.

16 26. "Erythromycin gel", an antibiotic topical gel, is a dangerous drug within the meaning  
17 of Code section 4022 in that it requires a prescription under federal law.

### 18 FIRST CAUSE FOR DISCIPLINE

#### 19 (Gross Negligence)

20 27. From approximately August 2003, through July 2004, Respondent was employed by  
21 Illumina Laser & Skin Care Center in Modesto, California (hereinafter "facility"). Respondent's  
22 duties included managing the practice and staff, training other registered nurses on laser  
23 procedures, supervising other registered nurses in the performance of laser procedures,  
24 monitoring patient care, and returning telephone calls to patients who had concerns or questions.  
25 Respondent also provided direct patient care services, including laser treatments. Respondent's  
26 supervising physician was Sanjay Patel, M.D.

27 28. Respondent is subject to disciplinary action pursuant to Code section 2761,  
28 subdivision (a)(1), on the grounds of unprofessional conduct, in that in and between August 2003,

1 and July 2004, Respondent was guilty of gross negligence within the meaning of Regulation  
2 1442, as follows:

3 a. Respondent performed laser treatments on patients, including, but not limited to,  
4 patients S. S. and D. S., without standardized procedures or protocols by the supervising  
5 physician permitting her to perform laser treatment.

6 b. Respondent trained other registered nurses on laser procedures and treatment without  
7 standardized procedures or protocols by the supervising physician permitting registered nurses to  
8 administer laser treatments to patients.

9 c. Respondent supervised other registered nurses in the performance of laser treatments  
10 on patients, including, but not limited to, patient E. P., without standardized procedures or  
11 protocols by the supervising physician permitting registered nurses to administer laser treatments  
12 to patients.

13 d. Respondent prescribed, dispensed, or furnished Vicodin to patients A and F and  
14 erythromycin gel to patient F without standardized procedures or protocols in place at the facility  
15 permitting Respondent to prescribe, dispense, or furnish medications to patients.

16 e. Respondent failed to offer patients S. S., D. S., and E. P. a physical examination by a  
17 nurse practitioner (Respondent) or physician upon learning that the patients received burns or  
18 injuries during their laser treatments.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Incompetence)**

21 29. Complainant incorporates by reference as though fully set forth herein the allegations  
22 contained in paragraph 27 above.

23 30. Respondent is subject to disciplinary action pursuant to Code section 2761,  
24 subdivision (a)(1), on the grounds of unprofessional conduct, in that in and between August 2003,

25 ///

26 ///

27 ///

28 ///

1 and July 2004, Respondent was guilty of incompetence within the meaning of Regulation 1443,  
2 as follows:

3 a. Respondent performed laser treatments on patients, including, but not limited to,  
4 patients S. S. and D. S., without standardized procedures or protocols by the supervising  
5 physician permitting her to perform that treatment.

6 b. Respondent trained other registered nurses on laser procedures and treatment without  
7 standardized procedures or protocols by the supervising physician permitting registered nurses to  
8 administer laser treatments to patients.

9 c. Respondent supervised other registered nurses in the performance of laser treatments  
10 on patients, including, but not limited to, patient E. P., without standardized procedures or  
11 protocols by the supervising physician permitting registered nurses to administer laser treatments  
12 to patients.

13 d. Respondent failed to perform a "good faith physical examination" on patients S. S.  
14 and D. S. before the patients received laser treatments.

15 e. Respondent failed to ensure that a "good faith physical examination" was performed  
16 on patient E.P. before the patient received laser treatments.

17 f. Respondent failed to obtain a complete medical history from patients S.S. and D.S.  
18 before the patients received laser treatments.

19 g. Respondent failed to ensure that a complete medical history was obtained from  
20 patient E. P. before the patient received laser treatments.

21 h. Respondent failed to perform a "good faith physical examination" on patients A and  
22 F before prescribing, dispensing, or furnishing Vicodin and erythromycin gel to the patients.

### 23 **THIRD CAUSE FOR DISCIPLINE**

24 (Violations of the Code)

25 31. Complainant incorporates by reference as though fully set forth herein the allegations  
26 contained in paragraph 27 above.

27 32. Respondent is subject to disciplinary action pursuant to Code section 2761,  
28 subdivision (d), in that in and between August 2003, and July 2004, Respondent violated or

1 attempted to violate, directly or indirectly, or assisted in or abetted the violation of, or conspired  
2 to violate, provisions of that Code, as follows:

3 a. Respondent committed acts constituting the unauthorized practice of medicine, as set  
4 forth in subparagraphs 28 (a) and 30 (a) above, in violation of Code section 2726.

5 b. Respondent conspired with or aided or abetted other registered nurses in performing  
6 the unauthorized practice of medicine, as set forth in subparagraphs 28 (b) and (c) and 30 (b) and  
7 (c) and above, in violation of Code section 2726.

8 c. Respondent prescribed, dispensed, or furnished medications to patients A and F  
9 without standardized procedures or protocols in place at the facility, as set forth in subparagraph  
10 28 (d) above, in violation of Code sections 2725.1 and 2836.1.

#### 11 **FOURTH CAUSE FOR DISCIPLINE**

##### 12 **(Prescribing and Furnishing Controlled Substances/Dangerous Drugs)**

13 33. Complainant incorporates by reference as though fully set forth herein the allegations  
14 contained in paragraph 27 above.

15 34. Respondent is subject to disciplinary action pursuant to Code section 2761,  
16 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
17 subdivision (a), in that in and between August 2003, and July 2004, Respondent prescribed,  
18 dispensed, or furnished Vicodin to patients A and F and erythromycin gel to patient F without  
19 standardized procedures or protocols in place at the facility permitting Respondent to prescribe,  
20 dispense or furnish medications to patients, as set forth in subparagraph 28 (d) above.

#### 21 **PRAYER**

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
23 and that following the hearing, the Board of Registered Nursing issue a decision:

24 1. Revoking or suspending Registered Nurse License Number 570376, issued to Sheila  
25 Jasveer Singh, also known as Sheila Singh and Sheila Singh Dobbins;

26 2. Revoking or suspending Nurse Practitioner Certificate Number 13628, issued to  
27 Sheila Jasveer Singh, also known as Sheila Singh and Sheila Singh Dobbins;

28 ///

1           3.     Revoking or suspending Nurse Practitioner Furnishing Number 13628, issued to  
2 issued to Sheila Jasveer Singh, also known as Sheila Singh and Sheila Singh Dobbins;

3           4.     Ordering Sheila Jasveer Singh, also known as Sheila Singh and Sheila Singh  
4 Dobbins, to pay the Board of Registered Nursing the reasonable costs of the investigation and  
5 enforcement of this case, pursuant to Business and Professions Code section 125.3;

6           5.     Taking such other and further action as deemed necessary and proper.

7  
8 DATED: \_\_\_\_\_

10/15/09

*Louise R. Bailey*

LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant